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WIPP file



State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
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→ Hand Delivered ← 4/24/96

EDGAR T. THORNTON, III
DEPUTY SECRETARY

~~CERTIFIED MAIL - RETURN RECEIPT REQUESTED~~

April 23, 1996

Mr. George Dials, Manager
Carlsbad Area Office
Department of Energy
P. O. Box 3090
Carlsbad, New Mexico 88221

Mr. Joe Epstein, General Manager
Westinghouse Electric Corporation
P.O. Box 2078
Carlsbad, New Mexico 88220

Dear Messrs. Dials and Epstein:

RE: Request for additional information on WIPP Solid Waste Management Units (SWMUs)

The New Mexico Environment Department's (NMED) Hazardous and Radioactive Materials Bureau (HRMB) recently received three data summary reports from WIPP describing the results of voluntary release assessments at selected SWMUs. On April 11, staff members from NMED and Mr. Rafael Casanova from EPA Region 6 toured representative surface SWMUs around the WIPP facility. On April 12, Mr. Casanova and Mr. Steve Zappe of my staff attended a briefing conducted by members of your staff (Craig Snider, Dan Robertson, Beth Bennington, Steve Kouba) to discuss the voluntary release assessment results and to determine if additional information was required prior to development of the Hazardous and Solid Waste Amendments (HSWA) module of the WIPP draft permit.

Attachment 1 contains HRMB's request for this additional information. HRMB will use this information to develop the Statement of Basis associated with the draft permit, justifying the inclusion or exclusion of SWMUs from the HSWA module. Much of this information has already been requested verbally either at the April 12 meeting, or during recent discussions related to the DOE/WID responses to the March 14 Notice of Deficiency. DOE/WID should submit the response to this request by May 3, 1996 in the form of another data summary report.

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Messrs. Dials and Epstein
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If you have any questions concerning this request for additional information related to SWMUs, please contact me or Mr. Steve Zappe at (505) 827-1561.

Sincerely,

Barbara Hoditschek

Barbara Hoditschek, RCRA Permits Program Manager
Hazardous & Radioactive Materials Bureau

Enclosures

cc: Ed Kelley, NMED
Benito Garcia, HRMB
Steve Zappe, HRMB
Susan McMichael, NMED OGC
Dan Robertson, WID
Craig Snider, DOE
David Neleigh, EPA Region 6
Matt Hale, EPA OSW
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Attachment 1
Request for Additional Information

1. Provide a map (or several maps) depicting the location of all SWMUs on Attachment 2. Use the SWMU designations provided on the list.
2. Identify SWMUs which are currently inaccessible (i.e., covered by pavement or a structure) which may impact investigation or remediation efforts.
3. Identify SWMUs which may be subject to dual regulatory authority, such as by the NMEMNRD Oil Conservation Division, NMED Solid Waste Bureau, Groundwater Protection and Remediation Bureau, or Surface Water Quality Bureau. Provide justification for these assessment.
4. Provide any supplemental information not included in the May 1994 "Assessment of Solid Waste Management Units at the Waste Isolation Pilot Plant" (NMED/DOE/AIP-94-1) which may be useful in determining which areas will be classified as SWMUs in the HSWA module of the draft permit. Use the following table as guidance for the type of information which may be helpful:

Candidate for inclusion:

- known releases of hazardous constituents
- hazardous constituents present
- hazardous constituents not precluded
- potential for release

Candidate for exclusion:

- hazardous constituents precluded by sampling or documented management practices
- no potential for release

Some sites may occur in both columns (i.e., hazardous constituents present and no potential for release). Provide sufficient information to assist the regulator in weighing these opposing factors in the decision-making process.

Attachment 2
SWMU List

SWMU #	SWMU Description
001a	H- 1 mudpit
001aa	WIPP-21 mudpit
001ab	WIPP-22 mudpit
001ac	DSP-207 mudpit
001ad	IMC-375 mudpit
001ae	IMC-377 mudpit
001af	H-16 mudpit
001ah	H-19 mudpit
001ai	WQSP-1 mudpit
001aj	WQSP-2 mudpit
001ak	WQSP-3 mudpit
001al	WQSP-4 mudpit
001am	WQSP-5 mudpit
001an	WQSP-6/6a mudpit
001aq	mudpit between H-14 & H- 4
001b	H- 2 mudpit
001c	H- 3 mudpit
001d	H- 5/P-21 mudpit
001e	H- 6/P-13 mudpit
001f	H-11/P- 9 mudpit
001g	H-14/P- 1 mudpit
001h	H-15/P- 2 mudpit
001i	H-18 mudpit
001j	P- 3 mudpit
001k	P- 4 mudpit
001l	WIPP-12/P-5 mudpit
001m	P- 6 mudpit
001n	P-15 mudpit
001o	Badger Unit mudpit
001p	Cotton Baby mudpit
001q	DOE-1 mudpit

Attachment 2
SWMU List

SWMU #	SWMU Description
001r	D-123 mudpit
001s	ERDA-9 mudpit
001t	IMC-374 mudpit
001u	IMC-376 mudpit
001v	IMC-456 mudpit
001w	IMC-457 mudpit
001x	WIPP-13 mudpit
001y	WIPP 18 mudpit
001z	WIPP-19 mudpit
002a	SPVD Salt Storage Pile
002b	Salt Storage Pile
002c	Top Soil Storage Area
002d	Top Soil Storage Area, SPVD Soil
003a	Brinderson Landfill
003b	New Landfill, Active/Inactive Units
004a	Portacamp Storage Yard, West Side
004b	Reclaimables Storage Yard
004c	Grout Storage Yard
005a	Concrete Batch Plant, WHB
005b	Concrete Batch Plant
005c	Concrete Batch Plant
006a	Salt Shaft Holding Pond
006b	Waste Handling Shaft Holding Pond
007a	Evaporation Pond
007b	Evaporation Pond
007c	Evaporation Pond
008a	SSA, Bldg 455
008b	SSA, Bldg 454
008c	SSA, Bldg 993
008d	SSA, Bldg W083
008e	SSA, Bldg 473

Attachment 2
SWMU List

SWMU #	SWMU Description
008f	SSA, Bldg 486
008g	SSA, Safety Bldg
008h	Inactive Hazardous Waste Storage Area
008i	SSA, AIS
008j	SSA, Bldg 482
008k	Petroleum Product/Used Oil, Bldg 454
008l	Hazardous Waste Staging Area, Bldg 474B
008m	Maintenance Tool Crib SSA #1, Bldg 454
008n	Future Haz Waste Staging Area, Bldg 474A
008o	SSA, Bldg 474-E
009a	SA, S1300/W30
009b	SA, E300 Shop
009c	SA, S1300/W170 Intersection
009d	Sat/Materials Storage West, S1300/W170
009e	Sat/Haz Materials Storage, E140/S700
009f	SA, S1600/W30
009g	SA, S1300/E140
009h	SA/Storage, N780
009i	SPVD Room 1, Old Maintenance Shop
009j	SA, West End N1420
010a	Salt Handling Shaft Sump, 0/0
010b	Waste Handling Shaft Sump
010c	Exhaust Shaft Sump
010d	Air Intake Shaft Sump
011	Sewage Treatment Facility
012a	Surface Bins
012b	Underground Bins